

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JEFFREY W. CARPENTER,

Plaintiff,

v.

TWIN CITY FIRE INSURANCE
COMPANY,

Defendant.

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CIVIL ACTION NO. 3:23-CV-00769-N

**DEFENDANT TWIN CITY FIRE INSURANCE COMPANY'S
PROPOSED FINAL JUDGMENT**

Defendant Twin City Fire Insurance Company files its proposed Final Judgment. On May 6, 2025, Plaintiff Jeffrey Carpenter forwarded his proposed Final Judgment to Twin City. (*See* Ex. 1.) Carpenter's proposed Final Judgment offered to have federal post-judgment interest apply only to the conditional appellate fees portion of the underlying state court judgment. (*See id.*) The offer was not withdrawn. On May 13, 2025, Twin City's counsel, Steven Knight, accepted Carpenter's offer. (*See* Ex. 2.) Further, Carpenter cannot recover an amount greater than the state court judgment in a *Stowers* case. His recovery is capped by the state court judgment amount.

Twin City is attaching Carpenter's proposed May 6, 2025 Final Judgment as Exhibit 1. Twin City is also attaching the email where Twin City's counsel accepted Carpenter's offer to apply the federal statute to the conditional appellate fees as Exhibit 2.

Twin City respectfully requests the Court to execute Twin City's proposed Final Judgment.

Respectfully submitted,

CHAMBERLAIN, HRDLICKA, WHITE,
WILLIAMS & AUGHTRY, P.C.

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LOCAL COUNSEL FOR TWIN CITY FIRE INSURANCE
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all counsel of record via facsimile, hand delivery, electronic mail, and/or certified mail on May 13, 2025 as follows:

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